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**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

<u>In Re</u>	:	
	:	Case No. 11-39675
MALIK WAHEED,	:	
	:	Judge: Honorable Novalyn L. Winfield
<u>Debtor.</u>	:	

**COUNSEL’S SUPPLEMENTAL CERTIFICATION IN SUPPORT OF MOTION TO REOPEN  
DEBTOR’S CHAPTER 7 CASE, TO FILE DEBTOR’S CERTIFICATES OF CREDIT  
COUNSELING AND DEBTOR EDUCATION OUT OF TIME, TO DISGORGE LEGAL FEES  
AND COSTS AND SEEK DAMAGES FROM DEBTOR’S FORMER COUNSEL, AND TO  
ISSUE THE DISCHARGE OF DEBTOR**

**SUSAN S. LONG, ESQ.** hereby certifies that:

1. I am the Debtor Malik Waheed’s current counsel. A Motion to Reopen Mr. Waheed’s Chapter 7 case was filed on May 26, 2014.
2. A hearing is currently scheduled in this matter on July 17, 2014, at 1:00 pm.
3. As recommended by the Court, an informal request to review Jonathan Greenman’s files regarding Mr. Waheed was sent via electronic mail on July 3, 2014. To date, no reply has been received. See Exhibit A.
4. In addition to requesting a review of former counsel’s files and in order to prepare for the hearing, I conducted research regarding the Certificate of Debtor Education filed in this matter by Mr. Greenman on February 14, 2012, and docketed as Document 11. See Exhibit B.
5. On July 3, 2014, I contacted GreenPath Debt Solutions, the agency listed on Mr. Waheed’s Certificate of Debtor Education in order to ascertain the method of, and party responsible for, payment of the course fee.
6. At that juncture, I learned that GreenPath had no record of Mr. Waheed in their database. I was asked to forward the Certificate to GreenPath via electronic mail for authentication.

7. On Monday, July 7, 2014, GreenPath advised the Certificate of Debtor Education filed by Mr. Greenman was fraudulent. In addition to the absence of Mr. Waheed's registration with the agency, GreenPath provided the following: 1) GreenPath's business name was listed incorrectly on the Certificate; 2) there is no record of a counselor by the name of Nancy Delccheia as having been an employee of GreenPath; 3) the requisite barcode is missing on the Certificate; and 4) the listed certificate number was not recorded in the Executive Office of the U.S. Trustees' (EOUST) database. A GreenPath representative forwarded a summary of these findings via electronic mail. See Exhibit C.

8. In order to rebut any allegation of fraud on behalf of the Debtor, an additional fraudulent filing by Mr. Greenman is being brought to the Court's attention. On July 13, 2012, Mr. Greenman filed a Certificate of Counseling in Case No. 12-24558-RTL (In re Mohamed Tariq). The Certificate was docketed as Document 10. Similarly to the case at hand, the Tariq case was also dismissed for the failure to file the Certificate of Counseling. The agency, InCharge Debt Solutions, not only deemed Mr. Tariq's Certificate to be fraudulent, but has also already contacted the Office of Oversight of the EOUST for investigation. See Exhibit D.

9. Given the above, Debtor respectfully requests the Court and/or the U.S. Trustee's Office begin an investigation to verify and determine the magnitude of Mr. Greenman's fraud upon the Court.

10. Although the Debtor is ready, willing and able to appear for testimony on July 17, 2014, it is respectfully requested that the Court assess whether such testimony is still required in order for the Court to rule on the Debtor's motion, including Debtor's request for the disgorgement of legal fees and damages.

**I HEREBY CERTIFY** that the above foregoing statements made by me are true to the best of my knowledge, information and belief. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

DATED: July 10, 2014

/s/ Susan S. Long  
SUSAN S. LONG, ESQ. (SL2268)  
ATTORNEY FOR DEBTOR